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January 4, 2016

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Hon. Valerie E. Caproni Thurgood Marshall United States Courthouse 40 Foley Square, Room 240 New York, NY 10007

RE: Canpotex Shipping Services Ltd. v. O.W. Bunkers

(UK) Ltd., et al, No. 15 Civ. 1351(VEC)

Dear Judge Caproni:

We represent John Sommer Schmidt as trustee on behalf of O.W. Supply & Trading A/S ("OW Denmark"). OW Denmark is a defendant in the above-captioned proceeding. We write pursuant to Your Honor's Individual Rule 1.C to request an extension of time to respond to the First Amended Complaint for Interpleader from January 4, 2016 to January 29, 2016. As this Court has been previously advised, OW Denmark is currently in liquidation and has assigned its rights to ING in a Cooperation Agreement. (*See*, *e.g.*, ECF No. 1 ¶ 30.) In this connection, we have been working and continue to work with counsel to the other respective parties in this action to dismiss OW Denmark from the case. Counsel for Plaintiff Canpotex Shipping Services, Ltd. have agreed to this extension.

Respectfully,

/s/ Julie E. Cohen
Julie E. Cohen

cc: All counsel (via ECF)